

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

NATIONAL BANK TRUST and PJSC BANK
OTKRITIE FINANCIAL CORPORATION,

Plaintiffs,

v.

VADIM BELYAEV, a/k/a/ VADIM WOLFSON,

Defendant.

Index No. 156903/2020

Justice Joel M. Cohen

Motion Seq. No. ____

**AFFIDAVIT OF VADIM WOLFSON IN SUPPORT OF MOTION TO DISMISS
COMPLAINT**

I, VADIM WOLFSON, being duly sworn, hereby depose and state under penalty of perjury as follows:

1. I am the defendant in the above-captioned matter, and I submit this Affidavit in support of the motion to dismiss this case.

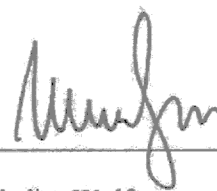
2. I am a Russian and Cypriot citizen. I am physically located in New York at the time of making this Affidavit. Russian is my native language and most of my business communications are conducted in Russian, but I am sufficiently fluently in English to make this statement.

3. I currently rent an apartment in New York City. I have no other residential property in the United States.

4. During the time period primarily at issue in this action, that is, 2015-2017, I resided mainly in Russia, England, and Cyprus. Because my ex-wife and children live in the New York

area, I would visit occasionally during that time. That is why I came to rent an apartment in New York City.

Dated: November 6, 2020
New York, NY



Vadim Wolfson

Sworn to before me this 6th day of November 2020


Notary Public

JAMES A. ROSSETTI
Notary Public, State of New York
No. 81-4982988
Qualified in New York County
Commission Expires _____

7/23/21